

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Petition of Bay State Gas Company for Approval)	
of its Long-Range Forecast and Resource Plan for the)	D.T.E. 02-75
five-year period November 1, 2002 through October 31,)	
2007 pursuant to G.L. c. 164, §§ 69 (I) <i>et seq.</i>)	
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**ATTORNEY GENERAL'S FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS**

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Bay State Gas Company or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.i

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide four copies of each response.
16. The term "Company" refers to Bay State Gas Company. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

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AG-1-1	Refer to page 42 of the Company's Load Forecast and Supply Plan. Please state what the Company's "obligation to serve" is. Provide citations to all statutes, laws, regulations, regulatory authority orders and pronouncements and tariffs supporting this response.
AG-1-2	Please provide a copy of the Company's Terms and Conditions (distribution and supplier).
AG-1-3	If the Company's Terms and Conditions require the Company to provide default service to transportation only customers that were not assigned capacity, please provide the citation to the specific provision.
AG-1-4	Refer to pages 43-44 of the Company's filing. Please provide all calculations, workpapers and assumptions supporting the Company's estimate that the 10% reserve requirement for returning transportation customers would increase the overall portfolio costs by 1%.
AG-1-5	Has the Company considered assessing the costs of the 10% reserve requirement to only the transportation customers without capacity assignment? If yes, why was this approach rejected? What other options did the Company consider in order to provide for the return of transportation only customers without capacity? Describe the other options in detail and how the Company might have implemented each.
AG-1-6	Please provide the number of new (never served by Bay State prior to

initiation of mandatory capacity assignment) transportation only customers by class and division. Include the annual volumes transported for these customers by class and division separately for the peak and off peak season and the number of these customers that migrated to default sales service.

- AG-1-7 Has the Company held an “open season” for customers that migrated without any capacity assignment? If yes, for each open season, please provide the number of customers that acquired capacity, the amount of capacity acquired by each customer and the specific capacity acquired. If there has not been an open season, please explain why. Provide all communications the Company has had with its customers regarding the acquisition of capacity.
- AG-1-8 Has the Company considered requiring customers that migrated without any capacity assignment to acquire capacity on their own in order to be served as a default service customer? If yes, why was this approach rejected? If no, what makes this alternative to the proposed 10% reserve unworkable?
- AG-1-9 Given the Company’s current portfolio configuration, is the Company able to serve any returning transportation only customers that were not assigned capacity? If yes, what level (customers and volumes) is the Company able to serve in each of the Company’s divisions. Explain how this load would be served (what capacity resources would be used) and the impact this would have on being able to maintain design year, day, etc. standards. Provide all supporting workpapers, calculations and assumptions.
- AG-1-10 Please provide copies of all correspondence and communication since 1999 between the Company and its transportation only customers without capacity allocations regarding their return to default sales service.
- AG-1-11 Please provide a schedule with the number of transportation only customers by division for each month during the period 1997 through 2002, include the volumes transported each month.
- AG-1-12 Please provide a schedule by division and customer class for the period 1997 through 2002 showing the number of customers returning to sales service and the monthly sales volumes.
- AG-1-13 At any time during the period 1997 to present, has the Company experienced a capacity deficiency as measured by its design day, design winter and cold snap standards? If yes, please provide the details of this deficiency—term of the deficiency, the cause, and the Company’s contingency plan.
- AG-1-14 Please provide the monthly volumes of gas transported by the Company on

PNGTS since the service commenced. Include the transportation cost for each month and the monthly supply cost. Provide copies of the supply contracts and all amendments. The contracts must include the pricing terms and be signed and dated.

Dated: March 12, 2003.